

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
FREE SPEECH SYSTEMS LLC,	§	Chapter 11 (Subchapter V)
	§	
	§	Case No. 22-60043
	§	
Debtor.	§	

**DEBTOR'S RESPONSE TO MOTION TO CONVERT
[Relates to ECF # 921]**

Debtor respectfully shows:

1. Any allegations, including in paragraphs 3 and 30, that Debtor is operating at a loss, are denied. When the CRO was appointed in this case there was less than \$200,000 in the bank. The last monthly operating report shows more than \$2.5 million, a figure which does not include another approximately \$2 million in cash reserve temporarily held back by the credit card processor. These figures are largely net of professional fees, other than the most recent billing cycles of the professionals.
2. Debtor denies the allegation in paragraph 3 that a realistic plan was never filed. But Debtor agrees that at this stage plan confirmation is not viable.
3. Debtor lacks knowledge as to whether the CT families have seen the trustee's report. For that reason, that portion of the allegations in paragraph 23 is denied.

Houston, Texas
Dated: June 14 , 2024

O'CONNORWECHSLER PLLC

/s/ Annie E. Catmull

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Certificate of Service

I certify that on June 14, 2024, I caused the attached to be served via ECF notification system to all registered users who have made an appearance.

/s/ Annie E. Catmull

Annie E. Catmull